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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 ZURICH AMERICAN INSURANCE  
12 COMPANY, a corporation; STARR  
INDEMNITY & LIABILITY COMPANY, a  
13 corporation,

14 Plaintiffs,

15 vs.

16 GUAM INDUSTRIAL SERVICES, INC., dba  
GUAM SHIPYARD; MATHEWS POTTHEN;  
17 THE UNITED STATES OF AMERICA, by  
and through the Secretary of Transportation for  
18 the Maritime Administration,

19 Defendants.

Case No.: CV 11 1874 MEJ

**RETURN OF SERVICE UPON GUAM  
INDUSTRIAL SERVICES, INC. AND  
MATTHEWS POTTHEN**

21 Attached is a letter dated May 2, 2011 from Guam Counsel for defendants Guam  
22 Industrial Services, Inc. and Mathews Potthen accepting service of the Summons, Complaint and  
23 related orders on their behalf.

1 DATED: May 2, 2011

2 BULLIVANT HOUSER BAILEY PC

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4 By /s/ Andrew B. Downs

5 Marilyn Raia

Andrew B. Downs

6 Attorneys for Plaintiffs Zurich American Insurance  
7 Company, Starr Indemnity & Liability Company

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May 2, 2011

**VIA EMAIL ONLY**

Mr. Andy Downs, Esq.  
Bullivant Houser Bailey PC  
601 California St., Suite 1800  
San Francisco, CA 94108-2823

Re: **Zurich American Insurance Company et al v. Guam Industrial Services, Inc. et al; CV No. 11 - 1874 MEJ**

Dear Mr. Downs:

Cabot Mantonona LLP represents Guam Industrial Services, Inc. and Mathews Pothén.

As you are aware from communications with Attorney Tom Sterling, on April 28, 2011 I accepted service of the complaint and summons on behalf of Guam Industrial Services (GIS) and Mr. Pothén. In exchange, plaintiffs in the action will allow thirty (30) days for GIS and Mr. Pothén to answer or otherwise respond to the complaint, up to and including May 31, 2011.

By accepting service in Guam of the complaint filed in, and a summons issued by, the USDC for the Northern District of California neither GIS nor Mr. Pothén consent to personal or subject matter jurisdiction of the Northern District, nor to venue in that District, and reserve all available arguments to challenge jurisdiction and venue.

Best Regards,



DAVID P. LEDGER

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